

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI**

JON C. HANSON,

Plaintiff,

vs.

RELIANCE LITIGATION, LLC,

Defendant.

**NOTICE OF REMOVAL PURSUANT TO 28 U.S.C. §§ 1441 AND 1331**

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI AND ALL PARTIES AND THEIR ATTORNEYS  
OF RECORD:**

**PLEASE TAKE NOTICE** that pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant Reliance Litigation, LLC (“Reliance”) hereby removes the above captioned action from the Circuit Court of the State of Missouri, in the County of Jackson, to the United States District Court for the Western District of Missouri. Reliance alleges that it is entitled to removal pursuant to 28 U.S.C. § 1331, based upon federal question jurisdiction, as follows:

**BACKGROUND**

1. Reliance is named in the Complaint filed on September 7, 2023 by Plaintiff Jon C. Hanson (“Plaintiff”) in the Circuit Court of the State of Missouri, in the County of Jackson Case No. 2316-CV25580 entitled *Jon C. Hanson v. Reliance Litigation, LLC* (the “State Court Action”).

2. Reliance was served with of a copy of the Complaint on November 21, 2023. Pursuant to 28 U.S.C. § 1446(a), true and correct copies of all process and pleadings served upon Reliance and are attached hereto as collective **Exhibit A** and incorporated herein by this

reference. Reliance has not yet filed an answer or otherwise responded to Plaintiff's Complaint in the State Court Action.

### BASIS FOR REMOVAL

3. This Notice of Removal is timely under 28 U.S.C. § 1446(b) and Federal Rule of Civil Procedure, Rule 6(a) because it was filed within 30 days of the service on Reliance of a copy of the Complaint on November 21, 2023.

4. The Complaint in the State Court Action contained causes of action for violation of the Telephone Consumer Protection Act ("TCPA") and the Missouri No-Call Law.

5. Removal to the United States District Court for the Western District of Missouri, is proper because this is the district which embraces the county in which Plaintiff filed the State Court Action. 28 U.S.C. § 1441(a).

6. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331 and is one which may be removed to this Court pursuant to the provisions of 28 U.S.C. § 1441 because it arises under the Telephone Consumer Protection Act, 47 U.S.C. § 227. *See, e.g., **Exhibit A**, Compl. ¶¶ 5-6, 8, 38-43.*

7. This Court has supplemental jurisdiction over all other claims asserted by Plaintiff pursuant to 28 U.S.C. § 1367(a) and 28 U.S.C. § 1441(c).

8. As required by 28 U.S.C. § 1446(d), Reliance will provide written notice of the removal of this action to Plaintiff, and to the Jackson County Circuit Court.

WHEREFORE, Defendant Reliance Litigation, LLC hereby removes this case from the Circuit Court for Jackson County, Missouri to this Court for all further proceedings, as provided by law, and request that, pursuant to 28 U.S.C. § 1446, the Circuit Court for Jackson County, Missouri proceed no further unless and until such further Order of this Court.

Dated: December 21, 2023.

HUSCH BLACKWELL LLP

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